



Mark D. Plevin
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December 18, 2015

BY FEDEX

Mr. Carl Brickner
United States Environmental Protection Agency, Region 9
75 Hawthorne Street, SFD-7-5
10th Floor
San Francisco, California 94105

Re: Response of Fireman's Fund Insurance Company to Information
Request by EPA Pursuant to 42 U.S.C. § 9404(e) Regarding Certain
Policies of Insurance Written by Fireman's Fund

Dear Mr. Brickner:

This letter comprises the response of Fireman's Fund Insurance Company to Questions 1 and 2 in the October 19, 2015 Section 104(e) Information Request (the "Request") from the U.S. Environmental Protection Agency, Region 9, in connection with its investigation of actual or potential contamination at the Oahu Sugar Mixing Site (the "Site"). In compliance with the instructions in ¶ 8(g) of the Instructions and Definitions contained in Enclosure A of the Request, Fireman's Fund's confidential responses to Questions Nos. 3 through 6 are being provided in a separate letter. Fireman's Fund's response was initially due on November 18, 2015, but Larry Bradfish, Assistant Regional Counsel for EPA Region 9, granted Fireman's Fund a 30-day extension to December 18, 2015.

Fireman's Fund has performed a reasonable search for records and information related to the Request, and reserves its rights to supplement this response should it later discover additional responsive documents or information. Fireman's Fund also reserves all of its rights with respect to, and does not waive, the attorney-client privilege and the protections afforded by the attorney work-product doctrine, as well as all other applicable privileges.

Questions 1 and 2 and Fireman's Fund's responses thereto are set forth below.

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1. For each person answering these questions on behalf of Respondent, provide:
 - a. Full name
 - b. Title
 - c. Business address
 - d. Business telephone number, fax number, and email address

Response:

I worked on these responses along with my law firm colleague, Tacie Yoon, and Daniel Kane and Amanda Webber of Fireman's Fund. Information about Mr. Kane and Ms. Webber is set forth below.

- a. Daniel Kane
- b. Claims Specialist
- c. Allianz Resolution Management (ARM)
1465 North McDowell Blvd
Petaluma, California 94954
- d. Mr. Kane may be contacted through undersigned counsel.
- a. Amanda Webber
- b. Claims Specialist
- c. Allianz Resolution Management (ARM)
1465 North McDowell Blvd
Petaluma, California 94954
- d. Ms. Webber may be contacted through undersigned counsel.

2. If Respondent wishes to designate an individual for all future correspondence concerning the Sites,^[1] including any legal notices, please so indicate here by providing that individual's name, address, telephone number, fax number, and email address.

Response:

Please direct all future correspondence concerning the Site as follows:

¹ Request No. 2 uses the term "Sites," but only one site is at issue, the Oahu Sugar Facility defined as "the Site" on page 1 of the Request. This response concerns only the Oahu Sugar Facility.

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Daniel Kane
Claims Specialist
Allianz Resolution Management (ARM)
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Petaluma, California 94954
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Fireman's Fund reserves the right to supplement and/or amend these responses should other responsive materials or information be identified. Please feel free to contact me if you have any questions about this response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark Plevin", with a stylized flourish at the end.

Mark D. Plevin
Attorney for Fireman's Fund Insurance
Company